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*\*Pro hac vice application forthcoming*

*Attorneys for Defendant*  
*MGM Resorts International*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL PIRCIO, individually and on behalf  
of all others similarly situated

Plaintiff,

v.

MGM RESORTS INTERNATIONAL,

Defendant.

Case No. 2:23-cv-1550-CDS-NJK

**STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
(SECOND REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Michael Pircio and Defendant MGM Resorts International (“MGM”) respectfully stipulate that MGM’s time to respond to the Complaint be extended from the current deadline of November 12, 2023 to and including December 12, 2023. This is the second stipulation for an extension of time to file MGM’s responsive pleading.

Good cause exists to further enlarge the time for MGM to respond to the Complaint. First, the parties intended to provide for an initial extension up to and including December 12, 2023, but, due to a scrivener’s error, mistakenly requested an extension through November 12, 2023. *See* Dkt. No. 13. Second, as of this date, there are now ten other related actions were filed against MGM in this and two other federal courts (the “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480 (D. Nev.); *Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537 (D. Nev.); *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577 (D. Nev.); *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698 (D. Nev.); *Bezack v. MGM Resorts Int’l*, No. 2:23-cv-01719 (D. Nev.); *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777 (D. Nev.); *Albrigo v. MGM Resorts Int’l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int’l, et al.*, No. 1:23-cv-20419 (D.N.J.). In *Owens* (Case No. 2:23-cv-01480, Dkt. No. 15), *Kirwan* (Case No. 2:23-cv-01481, Dkt. No. 16), *Zussman* (Case No. 2:23-cv-01537, Dkt. No. 17), and *Lackey* (Case No. 2:23-cv-01550, Dkt. No. 11), the parties have agreed to extend MGM’s time file a responsive pleading until December 12, 2023. MGM anticipates seeking the same extension to the other Related Actions pending in the District of Nevada within the coming week.

Based on the Parties’ current understanding of the claims, there are significant overlaps between this action and the Related Actions. As such, additional time is required to permit time to permit the various parties to the Related Actions to meet and confer, evaluate the potential consolidation of the cases, and conserve judicial resources. Moreover, this case remains in its infancy, and this request will not prejudice any party.

**WHEREAS** the Parties respectfully request that the Court extend MGM's time to answer, move, or otherwise respond to the Complaint from November 12, 2023, to and including December 12, 2023.

Dated: November 3, 2023

Respectfully submitted,

/s/ George Haines

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*Attorneys for Defendant  
MGM Resorts International*

**IT IS SO ORDERED:**

United States Magistrate Judge

DATED: November 3, 2023